



# **GIFTS, BENEFITS AND HOSPITALITY POLICY**

**Version 1.3**

**28 September 2021**

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## Gifts, Benefits and Hospitality Policy

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### 1. General Information

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<b>Document Title</b>	Gifts, Benefits and Hospitality Policy			
<b>Version number:</b>	1.3			
<b>Description:</b>	Policy outlining VicForests' requirements relating to gifts, benefits and hospitality			
<b>Author:</b>	Michele Binning, Senior Statutory Accountant			
<b>Creation date:</b>	10/10/2019			
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<b>Business Unit:</b>	Finance			
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#### 1.1. Annual Review

Review	Position	Date
AFRC		28/09/2021

# Gifts, Benefits and Hospitality Policy

## Table of Contents

<b>1. General Information</b> .....	<b>2</b>
1.1. Annual Review .....	2
<b>2. Purpose</b> .....	<b>4</b>
<b>3. Background</b> .....	<b>4</b>
<b>4. Scope and Application</b> .....	<b>4</b>
<b>5. Principles</b> .....	<b>4</b>
<b>6. Responsibilities</b> .....	<b>5</b>
<b>7. Offers of Gifts, Benefits and Hospitality</b> .....	<b>6</b>
7.1. Conflicts of interest and reputational risks .....	6
7.2. Requirements for refusing offers.....	6
7.3. Guidelines .....	7
7.4. Token offers .....	7
7.5. Non-token offers.....	7
7.6. Recording offers of gifts, benefits and hospitality .....	8
7.6.1. Internal gifts, benefits and hospitality register.....	8
7.6.2. Public register.....	8
7.6.3. Reporting to AFRC.....	9
7.7. Ownership of gifts offered to employees.....	9
7.8. Repeat offers.....	9
7.9. Ceremonial gifts .....	9
7.10. Hospitality provided by Victorian public sector organisations .....	10
<b>8. Provision of Gifts, Benefits and Hospitality</b> .....	<b>10</b>
8.1. Requirements for providing gifts, benefits and hospitality .....	10
8.2. Managing costs .....	10
<b>9. Breaches</b> .....	<b>11</b>
<b>10. Speak Up</b> .....	<b>11</b>
<b>11. Contacts for Further Information</b> .....	<b>11</b>
<b>12. Definitions and Abbreviations</b> .....	<b>12</b>
<b>13. Document Administration</b> .....	<b>13</b>
13.1. References .....	13
13.2. Risk .....	13
13.3. Document management and retention.....	14
13.4. Recent revision history.....	14
13.5. Reviewers.....	14
<b>13.6. Approvers</b> .....	<b>14</b>
<b>13.7. Approval history</b> .....	<b>14</b>
<b>Schedule A: Minimum Accountabilities</b> .....	<b>16</b>

## Gifts, Benefits and Hospitality Policy

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### 2. Purpose

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This document sets out the requirements for VicForests' employees when responding to and when providing offers of gifts, benefits and hospitality.

### 3. Background

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The Victorian Public Sector Commission (VPSC) has set minimum accountabilities for the appropriate management of gifts, benefits and hospitality. These are in accordance with the Standing Directions 2018 under the *Financial Management Act 1994* (Standing Directions).

Application of the minimum accountabilities is mandatory.

This document has been developed in accordance with the minimum accountabilities (see Schedule A), the (VPSC) *Code of Conduct for Victorian Public Sector Employees* and the *Code of Conduct for Directors of Victorian Public Entities* (the Code).

### 4. Scope and Application

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This document applies to all VicForests' employees. For the avoidance of doubt, "employees" includes Board members and contractors. It covers the following areas relating to gifts, benefits and hospitality:

- Principles;
- Responsibilities;
- Offers, including the recording process;
- Provision, including the recording process; and
- Consequences of breaching this policy.

### 5. Principles

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VicForests is committed to the following principles in relation to accepting or providing offers of gifts, benefits or hospitality:

- **Impartiality** - employees have a duty to place the public interest above their private interests when carrying out their official functions. Gifts, benefits or hospitality must not be accepted or provided where there could be a reasonable perception of, or actual, bias or preferential treatment.

Employees must not accept offers from those about whom they are likely to make business decisions.

- **Accountability** - employees are accountable for:
  - declaring all non-token offers of gifts, benefits and hospitality;
  - declining non-token offers of gifts, benefits and hospitality, or where an exception applies under this policy, seeking approval to accept the offer; and
  - the responsible provision of gifts, benefits and hospitality.

Managers are accountable for overseeing management of their direct reports' acceptance or refusal of non-token gifts, benefits and hospitality, modelling good practice and promoting awareness of VicForests' Gifts, Benefits and Hospitality Policy (the Policy) and processes.

## Gifts, Benefits and Hospitality Policy

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- **Integrity** - employees strive to earn and sustain public trust through providing or responding to offers of gifts, benefits and hospitality in a manner that is consistent with community expectations. Employees must refuse any offer that may lead to an actual, perceived or potential conflict of interest.
- **Risk-based approach** - VicForests will ensure gifts, benefits and hospitality risks are appropriately assessed and managed. Managers will ensure they are aware of the risks inherent in their teams' work and functions and monitor the risks to which their direct reports are exposed.

### 6. Responsibilities

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#### Board

The Board, as the Responsible Body, is responsible for:

- Reviewing and approving the Policy, and any changes; and
- Authorising publication of the Policy and public register on VicForests' public website.

#### Audit, Finance and Risk Committee (AFRC)

The AFRC is a sub-committee of the Board and is responsible for:

- Reviewing the Policy, and any changes;
- Reviewing the internal gifts, benefits and hospitality register and content for the public register;
- Ensuring that gifts, benefits and hospitality risks are appropriately assessed and managed;
- Recommending to the Board changes to the Policy, any emerging risks and the content for the public register.

#### Chief Executive Officer

The Chief Executive Officer (CEO), as the Accountable Officer, is responsible for ensuring that VicForests:

- Establishes, implements and reviews the Policy and processes for the effective management of gifts, benefits and hospitality, and which address the minimum accountabilities as set out in schedule A;
- Establishes and maintains an internal gifts, benefits and hospitality register recording sufficient information to monitor, assess and report on the minimum accountabilities;
- Communicates to employees that a breach of the Policy or processes may constitute criminal or corrupt conduct and result in disciplinary action;
- Establishes and communicates a clear policy position to business associates on the offering of gifts, benefits and hospitality to employees. This must take into consideration any whole of Victorian Government supplier codes of conduct;
- Reports at least annually to the AFRC on the administration and quality control of the Policy and internal register; and
- Publishes the Policy and public register on its public website.

#### Chief Financial Officer

The Chief Financial Officer (CFO) is responsible for:

- Managing the Policy, processes and the internal register;

## Gifts, Benefits and Hospitality Policy

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- Notifying the CEO immediately of any emerging issues relating to the Policy, processes and governance thereof; and
- Providing reports on gifts, benefits and hospitality issues to the CEO, AFRC and Board as required.

### 7. Offers of Gifts, Benefits and Hospitality

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This section sets out the process for accepting, declining and recording offers of gifts, benefits and hospitality. Any exceptions to this process must have the prior written approval of the CFO.

#### 7.1. Conflicts of interest and reputational risks

When determining whether to accept an offer, employees should consider whether acceptance could be perceived as influencing them in performing their duties or could lead to reputational damage. The more valuable the offer, the more likely this is.

#### 7.2. Requirements for refusing offers

Employees are required to refuse offers that:

- are likely to, or may be perceived to, influence them in the course of their duties or that raise an actual, potential or perceived conflict of interest;
- could bring VicForests, the public sector or themselves into disrepute;
- are made by a person or organisation about whom they are likely to make, or to influence, a decision, particularly offers:
  - made by a current or prospective supplier or customer; or
  - made during a procurement or tender process by a person or organisation involved in the process;
- are likely to be a bribe or inducement to make a decision or act in a particular way;
- extend to their relatives or friends;
- are monetary gifts or are easily converted to money;
- where, in relation to hospitality and events, VicForests will already be sufficiently represented to meet its business needs;
- could be perceived as endorsement of a product or service, or would unfairly advantage the supplier or customer in future procurement decisions if accepted; or
- are made in secret.

If an employee considers that they may have been offered a bribe or inducement, the offer must be reported to the CFO, who is required to report the matter to Victoria Police or the Independent Broad-Based Anti-Corruption Commission (IBAC):

Refer to VicForests' *Protected Disclosure Procedures* for more information in relation to handling disclosures of improper conduct engaged in and / or detrimental action taken by VicForests and / or its employees.

## Gifts, Benefits and Hospitality Policy

### 7.3. Guidelines

The following guidelines should be used to determine whether to accept or refuse an offer:

<b>G</b>	Giver	<p><b>Who is providing the gift, benefit or hospitality? What is their relationship to me?</b></p> <p>Does my role require me to select suppliers or customers, or award sponsorships? Could the person or organisation benefit from a decision I make?</p>
<b>I</b>	Influence	<p><b>Are they seeking to gain an advantage or influence my decisions or actions?</b></p> <p>Has the gift, benefit or hospitality been offered to me publicly or privately? Is it a courtesy or token of appreciation or a valuable non-token offer? Does its timing coincide with a decision I am about to make?</p>
<b>F</b>	Favour	<p><b>Are they seeking a favour in return for the gift, benefit or hospitality?</b></p> <p>Has the gift, benefit or hospitality been offered honestly? Has the person, or organisation made several offers over the last 12 months? Would accepting it create an obligation to return a favour?</p>
<b>T</b>	Trust	<p><b>Would accepting the gift, benefit or hospitality diminish public trust?</b></p> <p>How would the public view acceptance of this gift, benefit or hospitality? What would my colleagues, family, friends or associates think?</p>

### 7.4. Token offers

A token offer is an offer of a gift, benefit or hospitality that is of inconsequential or trivial value. This may include promotional items, such as pens, note pads, calendars, modest boxes of chocolates or small bunches of flowers and modest hospitality that would be considered a basic courtesy, such as light refreshments during a meeting.

Token offers cannot be worth more than **\$50** (excluding GST). Employees may generally accept token offers without approval, as long as the offer does not create a conflict of interest or lead to reputational damage.

### 7.5. Non-token offers

A non-token offer is an offer of a gift, benefit or hospitality that is, or may be perceived to be, of more than inconsequential or trivial value. This may include artwork, jewellery, expensive pens, a conference invitation, an expensive bottle of wine or an elaborate hamper.

All non-token offers which are accepted must be approved in writing by the employee's manager and meet the following requirements:

- It does not raise an actual, potential or perceived conflict of interest, or have the potential to bring the employee, VicForests or the public sector into disrepute; and
- There is a legitimate business reason for acceptance; it is offered in the course of the employee's official duties, relates to the employee's responsibilities and has a benefit to VicForests, the public sector or the State.

Employees may be offered a gift, benefit or hospitality which is accepted before having the opportunity to seek written approval from their manager. For example, a wrapped gift may be offered that is later identified as being a non-token gift. In these cases, the employee must seek approval from their manager within five business days.

Where the gift is likely to bring the employee or VicForests into disrepute, the gift must be returned. If the gift creates a conflict of interest for the employee, the gift must be returned, or ownership transferred to VicForests.

## Gifts, Benefits and Hospitality Policy

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### 7.6. Recording offers of gifts, benefits and hospitality

#### 7.6.1. Internal gifts, benefits and hospitality register

All gifts, benefits or hospitality offered or received in excess of **\$50** (excluding GST), or of an unusual nature, whether accepted or declined, must be recorded in the internal gifts, benefits and hospitality register, except for promotional items.

These are to be declared to the CFO on the Gifts, Benefits and Hospitality Declaration Form (which is available on SharePoint). The completed form is to be provided to the Executive Assistant who maintains the internal register on behalf of the CFO.

The reason for accepting the offer must be recorded in the internal register with sufficient detail to link the acceptance to the employee's role and benefit to VicForests, the public sector or State. The detail should not, for example, simply state "Networking" or "Maintaining stakeholder relationships". This is not likely to be sufficient to link the employee's role to the benefit to VicForests, the public sector or State. Examples of "acceptable" reasons are:

- "I am responsible for evaluating and reporting on the outcomes of VicForests' sponsorship of Event A. I attended Event A in an official capacity and reported back to VicForests on the event."
- "I presented to a visiting international delegation. The delegation gave me a cultural item worth an estimated \$200. Declining the gift would have caused offence. The gift was accepted on behalf of VicForests."

#### 7.6.2. Public register

The public register is a subset of information detailed in the internal register and is published on VicForests external website. The public register should cover the current and previous financial years and include the following information:

- The date an offer was made and position of the employee to whom the offer is made;
- Whether the offer was accepted or declined by the employee;
  - If accepted, the employee's position and division is to be recorded (e.g. General Manager, Corporate Affairs);
  - If declined, only the employee's position is recorded (e.g. General Manager).

The employee's name should **not** be recorded.

- The name of the individual or organisation making the offer;
  - If accepted, the organisation's name and individual's position title is recorded (e.g. General Manager, Oz Sports);
  - If declined, a generic description of the organisation or person who made the offer is recorded (e.g. Sports Association).
- The nature of the offer and its estimated or actual value; and
- The decision on ownership of the offer.

Token offers and receipts of ceremonial gifts do **not** need to be published online.

Consideration should be given to any privacy requirements under the *Privacy and Data Protection Act 2014*. These requirements include:

- Reasonable steps being taken to protect personal information collected and held by VicForests;



## Gifts, Benefits and Hospitality Policy

- Restricting access to the register to the Executive Assistant and select members of the Finance Team; and
- A publicly available privacy policy and collection notice to advise employees and organisations when personal information will be collected.

The Executive Assistant maintains the public register on behalf of the CFO.

### Example of an accepted offer on the public register

Date	Recipient	Donor	Offer	Estimated or actual value	Decision	Ownership
05/08/2018	General Manager, Corporate Services	General Manager, Oz Sports	iPad	\$250 (est.)	Accepted	Transferred to VicForests

### Example of a declined offer on the public register

Date	Recipient	Donor	Offer	Estimated or actual value	Decision	Ownership
05/08/2018	General Manager, Corporate Services	Sports Association	iPad	\$250 (est.)	Declined	Returned to donor that provided the offer

### 7.6.3. Reporting to AFRC

The AFRC will receive a report at least annually on the administration and quality control of the Policy and internal register. The report will include analysis of VicForests' gifts, benefits and hospitality risks; including multiple offers from the same source and offers from business associates, risk mitigation measures and any proposed improvements.

### 7.7. Ownership of gifts offered to employees

Non-token gifts that have been accepted by an employee may be retained by the employee if the gift is not likely to bring VicForests or the employee into disrepute, and where the employee's manager has provided written approval.

Employees must transfer to VicForests any official gifts or gifts of cultural significance or significant value.

### 7.8. Repeat offers

Receiving multiple offers (token or non-token) from the same person or organisation can create a stronger perception that the person or organisation could influence employees. Employees should refuse repeat offers from the same source if they create a conflict of interest or may lead to reputational damage.

### 7.9. Ceremonial gifts

Ceremonial gifts are official gifts provided as part of the culture and practices of communities and government, within Australia or internationally. Ceremonial gifts are the property of VicForests, irrespective of value, and should be accepted by employees on behalf of VicForests. The receipt of ceremonial gifts should be recorded on the internal register, but this information does not need to be included in the public register.

## Gifts, Benefits and Hospitality Policy

### 7.10. Hospitality provided by Victorian public sector organisations

When offered hospitality by a Victorian public sector organisation, employees should consider the requirements of the minimum accountabilities. (See Schedule A).

## 8. Provision of Gifts, Benefits and Hospitality

This section sets out the requirements for providing gifts, benefits and hospitality.

### 8.1. Requirements for providing gifts, benefits and hospitality

Gifts, benefits and hospitality may be provided when welcoming guests, to facilitate the development of business relationships, further public sector business outcomes and to celebrate achievements.

When deciding whether to provide gifts, benefits or hospitality or the type of gift, benefit or hospitality to provide, employees must ensure that:

- any gift, benefit or hospitality is provided for a business reason that furthers the conduct of official business or other legitimate VicForests' goals, or promotes and supports government policy objectives and priorities;
- costs are proportionate to the benefits of providing the gift, benefit or hospitality, and would be considered reasonable in terms of community expectations; and
- it does not raise an actual, potential or perceived conflict of interest.

The following '**Host test**' should be used to determine whether to provide gifts, benefits or hospitality to business associates or VicForests' employees.

<b>H</b>	Hospitality	<p><b>To whom is the gift or hospitality being provided?</b> Will recipients be external suppliers and customers, or VicForests' employees?</p>
<b>O</b>	Objectives	<p><b>For what purpose will hospitality be provided?</b> Is the hospitality being provided to further the conduct of official business? Will it promote and support government policy objectives and priorities? Will it contribute to employee wellbeing and workplace satisfaction?</p>
<b>S</b>	Spend	<p><b>Will public funds be spent?</b> What type of hospitality will be provided? Will it be modest or expensive, and will alcohol be provided as a courtesy or an indulgence? Will the costs incurred be proportionate to the benefits obtained?</p>
<b>T</b>	Trust	<p><b>Will public trust be enhanced or diminished?</b> Could you publicly explain the rationale for providing the gift or hospitality? Will the event be conducted in a manner which upholds the reputation of the public sector? Have records in relation to the gift or hospitality been kept in accordance with reporting and recording procedures?</p>

### 8.2. Managing costs

Employees should carefully manage the costs involved with providing gifts, benefits and hospitality. The following questions may be useful to assist employees to decide on the type of gift, benefit or hospitality to provide:

- Will the cost of providing the gift, benefit or hospitality be proportionate to the potential benefits?

## Gifts, Benefits and Hospitality Policy

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- Is an external venue necessary or does VicForests have facilities to host the event?
- Is the proposed catering or hospitality proportionate to the number of attendees?
- Does the size of the event and number of attendees align with intended outcomes?
- Is the gift symbolic, rather than financial, in value?
- Will providing the gift, benefit or hospitality be viewed by the public as excessive?

Employees should refer to the following VicForests' instructions for further information:

- *Financial Code of Conduct* – includes further guidance in relation to gifts, benefits and hospitality, the tendering and procurement process, use of VicForests' property, facilities and equipment, the declaration of financial and other interests process and reporting unlawful and inappropriate behaviour;
- *Fraud and Corruption Control Instruction* – includes guidance on what is fraud, corruption and other losses (including examples) and reporting significant or systematic suspected fraud, corruption or other losses;
- *Procurement Instruction* – includes principles of accountability and probity, value for money and open and fair competition. The instruction also includes rules regarding the purchase and approval process for flowers and / or gifts for official functions, ceremonies and for offering condolences in respect of an employee's immediate family or household; and
- *Travel and Hospitality Expenditure Instruction* – includes rules in relation to the provision of hospitality and alcohol, frequent flyer schemes and similar loyalty programs (these are not permitted), international conferences and seminar invitations and the expenditure and approval process.

### 9. Breaches

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Disciplinary action, including dismissal, may be taken where an employee fails to adhere to this policy. This includes where an employee fails to avoid or identify, declare and manage a conflict of interest related to gifts, benefits and hospitality in accordance with VicForests' *Conflicts of Interests Policy* and *Conflict of Interest Instruction*.

For further information on managing breaches of this policy, please contact VicForests' Human Resources Department.

### 10. Speak Up

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Employees who consider that gifts, benefits and hospitality or conflict of interest within VicForests may not have been declared or are not being appropriately managed should speak up and notify their line manager, a general manager or the CFO. Employees who believe they have observed corrupt conduct in their colleagues may also make a protected disclosure directly to IBAC (<https://www.ibac.vic.gov.au/>).

VicForests will take decisive action, including disciplinary action, against employees who discriminate against or victimise those who speak up in good faith.

### 11. Contacts for Further Information

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A conflict of interest resulting from the acceptance of a gift, benefit or hospitality is not always clear to those who have them. Employees who are unsure about accepting a gift, benefit or hospitality, or the application of this policy, should ask their manager, General Manager or the CFO for advice.

## Gifts, Benefits and Hospitality Policy

### 12. Definitions and Abbreviations

Term	Definition
AFRC	Audit, Finance and Risk Committee
Benefits	Benefits include preferential treatment, privileged access, favours or other advantage offered to an employee. They may include invitations to sporting, cultural or social events, access to discounts and loyalty programs and promises of a new job. The value of benefits may be difficult to define in dollars, but as they are valued by the employee, they may be used to influence the employee's behaviour.
Business associate	An employee or body that VicForests has, or plans to, establish some form of business relationship with, or who may seek commercial or other advantage by offering gifts, benefits or hospitality.
CEO	Chief Executive Officer
CFO	Chief Financial Officer
Conflict of interest	Conflicts may be: <b>Actual:</b> There is a <u>real conflict</u> between an employee's public duties and private interests. <b>Potential:</b> An employee has private interests that <u>could conflict</u> with their public duties. This refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that risk. <b>Perceived:</b> The public or a third party could reasonably <u>form the view</u> that an employee's private interests could improperly influence their decisions or actions, now or in the future.
Gifts	Gifts are free or discounted items or services and any item or service that would generally be seen by the public as a gift. These include items of high value (e.g. artwork, jewellery, or expensive pens), low value (e.g. small bunch of flowers), consumables (e.g. chocolates) and services (e.g. painting and repairs).
GST	Goods and services tax.
Hospitality	Hospitality is the friendly reception and entertainment of guests. Hospitality may range from light refreshments at a business meeting to expensive restaurant meals and sponsored travel and accommodation.
IBAC	Independent Broad-Based Anti-Corruption Commission <a href="https://www.ibac.vic.gov.au/">https://www.ibac.vic.gov.au/</a>
Non-token offer	A non-token offer is an offer of a gift, benefit or hospitality that is, or may be perceived to be of more than inconsequential or trivial value.
Public official	Public official has the same meaning as section 4 of the <i>Public Administration Act 2004</i> and includes, public sector employees, statutory office holders and directors of public entities.
Public register	A public register is a subset of the information contained in VicForests' (internal) register, for publication as required by the minimum accountabilities.
Register	A register is a record of all declarable gifts, benefits and hospitality.
Standing Directions	Standing Directions 2018 under the <i>Financial Management Act 1994</i>
The Code	The VPSC's <i>Code of Conduct for Victorian Public Sector Employees</i> ; and the <i>Code of Conduct for Directors of Victorian Public Entities</i>
Token offer	A token offer is an offer of a gift, benefit or hospitality that is of inconsequential or trivial value (such as basic courtesy).
VPSC	Victorian Public Sector Commission

## Gifts, Benefits and Hospitality Policy

### 13. Document Administration

#### 13.1. References

Document Title	Document Owner
<i>Financial Management Act 1994</i>	Victorian Legislation and Parliamentary Documents <a href="http://www.legislation.vic.gov.au/">http://www.legislation.vic.gov.au/</a>
<i>Privacy and Data Protection Act 2014</i>	Victorian Legislation and Parliamentary Documents <a href="http://www.legislation.vic.gov.au/">http://www.legislation.vic.gov.au/</a>
<i>Public Administration Act 2004</i>	Victorian Legislation and Parliamentary Documents <a href="http://www.legislation.vic.gov.au/">http://www.legislation.vic.gov.au/</a>
Standing Directions 2018 under the <i>Financial Management Act 1994</i>	Department of Treasury and Finance <a href="https://www.dtf.vic.gov.au/financial-management-government/standing-directions-2018-under-financial-management-act-1994">https://www.dtf.vic.gov.au/financial-management-government/standing-directions-2018-under-financial-management-act-1994</a>
The VPSC's: <i>Code of Conduct for Victorian Public Sector Employees</i> ; and the <i>Code of Conduct for Directors of Victorian Public Entities</i>	Victorian Public Sector Commission <a href="https://vpsc.vic.gov.au/resources/code-of-conduct-for-employees/">https://vpsc.vic.gov.au/resources/code-of-conduct-for-employees/</a>
The VPSC's: <i>Gifts, Benefits and Hospitality Minimum Accountabilities</i> ; <i>Gifts, Benefits and Hospitality Policy Guide</i> ; and the <i>Model Gifts, Benefits and Hospitality Policy</i>	Victorian Public Sector Commission <a href="https://vpsc.vic.gov.au/resources/gifts-benefits-and-hospitality-resource-suite/">https://vpsc.vic.gov.au/resources/gifts-benefits-and-hospitality-resource-suite/</a>
VicForests' <i>Conflicts of Interests Policy</i>	VicForests' SharePoint
VicForests' <i>Conflict of Interest Instruction</i>	VicForests' SharePoint
VicForests' <i>Financial Code of Conduct</i>	VicForests' SharePoint
VicForests' <i>Fraud and Corruption Control Instruction</i>	VicForests' SharePoint
VicForests' <i>Procurement Instruction</i>	VicForests' SharePoint
VicForests' <i>Protected Disclosure Procedures</i>	VicForests' SharePoint
VicForests' <i>Travel and Hospitality Expenditure Instruction</i>	VicForests' SharePoint
Victoria Police	<a href="https://www.police.vic.gov.au/compliments-and-complaints">https://www.police.vic.gov.au/compliments-and-complaints</a>

#### 13.2. Risk

This instruction addresses the following risks:

Risk	Likelihood	Consequence	Risk Rating
Loss of integrity for VicForests	Unlikely	Minor	Low

## Gifts, Benefits and Hospitality Policy

### 13.3. Document management and retention

Unless stipulated within this Instruction, documentation generated from this Instruction must be managed according to VicForests' *Records Management Instruction*. This Instruction should be retained for a minimum of 7 years after it is superseded by another version.

### 13.4. Recent revision history

A summary of the recent document revision history is outlined below.

Version number	Revision date	Revision author(s)	Revision notes
1.0	09/10/2019	Michele Binning	New document
1.1	27/02/2020	Michele Binning	Table of Contents updated
1.2	01/10/2020	Michele Binning	Note 7.10: Hospitality provided by Victorian public sector organisations - added cross-reference to Schedule A: Minimum Accountabilities Other minor grammatical changes
1.3	28/09/2021	Kerrie Maren	Annual review of policy, Section 10: IBAC contact details added Section 13.2: Risk added

### 13.5. Reviewers

Required reviewers
The following positions should review this document prior to approval of any significant revisions:
Chief Accountant
Chief Financial Officer

Reviewers
This version was reviewed by:
Stephen Gatley, Chief Accountant
AFRC

### 13.6. Approvers

The following parties are to approve this document and any subsequent significant updates:
Board

### 13.7. Approval history

Version number	Approval Date	Approval notes
1.0	27/02/2020	Approved subject to amendment of errors in Table of Contents
1.1	27/02/2020	General Counsel presented this version to the Board for approval of minor amendment
1.2	08/10/2020	Chief Financial Officer presented this version to the AFRC meeting on 01/10/2020 for review and then to the Board on 08/10/2020 for approval. Amendments approved.

## Gifts, Benefits and Hospitality Policy

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## Gifts, Benefits and Hospitality Policy

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### Schedule A: Minimum Accountabilities

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#### Public officials offered gifts, benefits and hospitality:

1. Do not, for themselves or others, seek or solicit gifts, benefits and hospitality.
2. Refuse all offers of gifts, benefits and hospitality that:
  - are money, items used in a similar way to money, or items easily converted to money;
  - give rise to an actual, potential or perceived conflict of interest;
  - may adversely affect their standing as a public official or which may bring their public sector employer or the public sector into disrepute; or
  - are non-token offers without a legitimate business benefit.
3. Declare all non-token offers (valued at \$50 or more, excluding GST) of gifts, benefits and hospitality (whether accepted or declined) on VicForests' register, and seek written approval from their manager, a general manager or the CFO to accept any non-token offer.
4. Refuse bribes or inducements and report inducements and bribery attempts to the CFO or their delegate (who should report any criminal or corrupt conduct to Victoria Police or IBAC).

#### Public officials providing gifts, benefits and hospitality:

5. Ensure that any gift, benefit and hospitality is provided for a business purpose in that it furthers the conduct of official business or other legitimate VicForests' goals or promotes and supports government policy objectives and priorities.
6. Ensure that any costs are proportionate to the benefits obtained for the State and would be considered reasonable in terms of community expectations.
7. Ensure that when hospitality is provided, employees demonstrate professionalism in their conduct, and uphold their obligation to extend a duty of care to other participants.

#### Heads of public sector organisations:

8. Establish, implement and review policy and processes for the effective management of gifts, benefits and hospitality that comprehensively address these minimum accountabilities.
9. Establish and maintain a register for gifts, benefits and hospitality offered to public officials that, at a minimum, records sufficient information to effectively monitor, assess and report on these minimum accountabilities.
10. Communicate and make clear within VicForests that a breach of the gifts, benefits and hospitality policy or processes may constitute a breach of binding codes of conduct and may constitute criminal or corrupt conduct and may result in disciplinary action.
11. Establish and communicate a clear policy position to business associates on the offering of gifts, benefits and hospitality to employees, including possible consequences for a business associate acting contrary to VicForests' policy position. This must take into consideration any whole of Victorian Government supplier codes of conduct.
12. Report at least annually to the AFRC on the administration and quality control of gifts, benefits and hospitality policy, processes and register. This report must include analysis of gifts, benefits and hospitality risks (including repeat offers from the same source and offers from business associates), risk mitigation measures and any proposed improvements.
13. Publish VicForests' gifts, benefits and hospitality policy and register on its public website. The published register should cover the current and the previous financial year.